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February 20, 2013

VIA ECF

The Honorable Steven M. Gold
Chief United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

Re: Turkmen, et. al. v. Ashcroft, et. al. Civ. No. 02-02307-JG-SMG

Dear Judge Gold:

I write on behalf our client, Dennis Hasty, and the other remaining Defendants in connection with the Court's order dated January 30, 2013 that the parties meet and confer and submit a proposed case management plan to the Court by February 22, 2013.

Although the parties have begun the meet-and-confer process, and have made progress, the demanding litigation schedules of lead counsel for Defendants Hasty, Sherman, and Zenk have not permitted the parties sufficient time to submit a considered case management plan by the current deadline of February 22. We therefore request an enlargement of time to and including March 8, 2013. We have consulted with counsel for Plaintiffs, and they have consented to the requested extension.

Because no other deadlines are pending in this case, the requested extension will not adversely affect the case schedule, nor will it otherwise impede its efficient progress. As the Court is aware, at least some of the remaining Defendants are considering an appeal of Judge Gleeson's ruling on their respective motions to dismiss. If one or more of the Defendants seeks an appeal, it will stay this case pending resolution of that appeal.

In light of the foregoing, Defendants respectfully request that the Court grant their request for an extension of time to and including March 8, 2013 for submission of a proposed case management plan.

Respectfully submitted,

/s/ Shari Ross Lahlou

Hon. Steven M. Gold
February 15, 2013
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Attorney for Defendant Dennis Hasty

cc: All parties who do not receive ECF notices (by electronic mail if available, otherwise by First Class U.S. Mail)